

THE UNIVERSITY OF IOWA



March 11, 2005

Certified Mail No. 7003-1010-0004-4860-0183 (EPA)  
No. 7003-1010-0004-4860-0176 (IDNR)

Director, Air, RCRA, and Toxics Division  
ATTN: Mike Bronoski  
U.S. Environmental Protection Agency  
EPA Region VII  
901 N. 5th Street,  
Kansas City, KS 66101

REC'D  
MAR 14 2005  
APCC

Bureau Chief, Air Quality Bureau  
ATTN: Diane Brockshus  
Iowa Department of Natural Resources  
7900 Hickman Rd., Suite 1  
Urbandale, IA 50322

Re: Initial Notifications; Industrial, Commercial, Institutional Boiler MACT  
40 CFR Part 63 Subpart DDDDD and 40 CFR § 63.9

Dear Mr. Bronoski and Ms. Brockshus:

Enclosed please find "Initial Notifications" for ten boilers owned by the University of Iowa. These notifications were prepared according to the University's understanding of the Boiler MACT standard published in the Federal Register on September 13, 2004, which provides that these initial notifications be submitted not later than March 12, 2005 (40 CFR § 63.7545.) Six of the boilers are located on the University of Iowa main campus. Of these six boilers, five are located at the Main Power Plant and one is located at University of Iowa Hospitals and Clinics (UIHC.) The boiler at UIHC is natural gas fired, and is limited by the terms of its Iowa air construction permit to 250 hours per year or less (Iowa Construction Permit No. 96-A-1245, Condition 12.) Accordingly, we have marked the box indicating that the boiler is subject to a federally enforceable permit that limits the capacity factor to 10% or less.

Three of the five boilers at the main power plant are gas-fired, two are solid fuel boilers. Each of the five is being reported on a separate form.

Four gas-fired boilers are located at the Oakdale campus which is not a major source of HAP and thus not subject to this MACT standard. They are reported on a single form, and the box is marked that the source is an area source.

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Please advise regarding the adequacy of these initial notifications and any changes necessary for any future initial notifications.

Sincerely,

A handwritten signature in cursive script that reads "Michael Paul Valde". The signature is written in dark ink and is positioned below the word "Sincerely,".

Michael Paul Valde  
Environmental Compliance Manager

## INITIAL NOTIFICATION REPORT

### SECTION I GENERAL INFORMATION

This form is being submitted in accordance with 40 CFR 63.9(b) and as required by 40 CFR 63.7545.

If you own or operate an affected source, submit this report by MARCH 12, 2005, or WITHIN 120 CALENDAR DAYS after your boiler or process heater becomes subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, whichever is later.

- A. Print or type the following information for each facility for which you are making initial notification: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (IF AVAILABLE)		Facility I.D. Number (IF AVAILABLE)	
		52-12-001    19-103-00066    yes	
Responsible Official's Name/Title			
Douglas K. True / Senior VP of Finance & Operations & University Treasurer			
Street Address			
105 Jessup Hall			
City	State	ZIP Code	
Iowa City	IOWA	52242	
Facility Name			
The University of Iowa Oakdale Campus			
Facility Street Address (If different than Responsible Official's Street Address)			
2320 Crosspark Road			
Facility Local Contact Name		Title	Phone
Michael P. Valde		Environmental Compliance Mgr	319-335-6190
City	State	ZIP Code	
Coralville	Iowa	52319	

Check the box that applies. (§63.9(b)(2)(v))

- ☐ My facility is a major source of Hazardous Air Pollutants (HAP)
- ☒ My facility is an area source of HAP

*NOTE: A major source is a source that emits or has the potential to emit 10 tons per year, or more, of any one HAP or 25 tons per year, or more, of multiple HAP. All other sources are area sources. The major/area source determination is based on all HAP emission points inside the facility fence line, not just inside the facility itself.*

If you answered that your facility is an area source, the facility is not subject to this rule. Records of your applicability determination must be maintained on site for 5 years. See 40 CFR 63.10(b)(3). If you answered that your facility is a major source for HAP emissions, complete the remaining questions.

- C. Indicate the relevant standard or other requirement that is the basis for this notification and the source's compliance date: (§63.9(b)(2)(iii))

Basis for this notification (relevant standard or other requirement)	Anticipated Compliance Date (mm/dd/yy)
National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD)	

## SECTION II SOURCE DESCRIPTION

- A. Briefly describe the nature, size, design, and method of operation of the source.  
(§63.9(b)(2)(iv))

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*NOTE: If the same information requested above is contained in a title V permit application or permit, you may attach the relevant pages from that document to this notification and reference those pages above.*

- B. Identify the types of emission points within the affected source subject to the relevant standard and the types of hazardous air pollutants emitted. (§63.9(b)(2)(iv))

### Types of Emission Points

*NOTE: Boilers and process heaters are typically served by chimneys or stacks for flue gas release and dispersion.*

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### Types of HAP Emitted

Check the boxes indicating the principal types of HAP emitted by the affected source (i.e., boilers and process heaters). Check all that apply. For example, coal and residual oil fired boilers or process heaters would typically emit all three types of HAP. Natural gas fired boilers or process heaters would typically emit organic HAP.

- ☐ Metal HAP (for example, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, selenium)
- ☐ Organic HAP (for example, acetaldehyde, benzene, formaldehyde, toluene, xylenes)
- ☐ Acid gas HAP (for example, hydrogen chloride, hydrogen fluoride)

**SECTION III  
SPECIFIC REQUIREMENTS**

Section 63.7545(b)(2) requires you to include in this Initial Notification a signed statement indicating whether your affected source has a federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent.

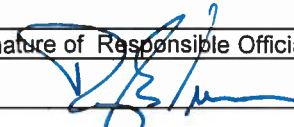
- ☐ My facility has a federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent for the following boilers and process heaters.

Use the facility identification number from section I.A.

- ☐ My facility does not have federally enforceable permit that limits the annual capacity factor for any individual boiler or process heater to less than or equal to 10 percent.

**SECTION IV  
CERTIFICATION**

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained or referenced in this initial notification report are true, accurate, and complete.

Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
Douglas K. True	Senior VP of Finance & Operations & University Treasurer	
Signature of Responsible Official		
		3/11/05

*Note: Responsible official is defined in 40 CFR §63.2, §70.2 and §71.2 and in EPA-approved State title V operating permits programs.*